## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA GREENSBORO DIVISION CASE NUMBER: 1:21-cv-506

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)	
)	Defendants' Response in Opposition to
)	Plaintiff's Motion to Certify NCWHA
)	Class Action Under Rule 23
)	
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)	

COME NOW the Defendants, by and through the undersigned counsel, and pursuant to Local Rule 7.3 and Rule 23 of the Federal Rules of Civil Procedure responding in opposition to the Plaintiff's Rule 23 Motion. The Defendants memorandum in opposition to the Plaintiff's motion is filed contemporaneously herewith, with the following attached exhibits:

## EXH. NO. **EXHIBIT DESCRIPTION** 1 Traci Martin Deposition Transcript 2 Tiffany Wade Deposition Transcript w/ attached exhibits 1-5, 7-8 3 Traci Martin Declaration w/ attached exhibit A 4 JaSayah Bell Declaration w/ attached exhibits 5 Tyler Martin Declaration 6 Shamekia Allred-Clapp Interrogatory Responses 7 Tika Arnold Interrogatory Responses 8 Marquashia Bradley Interrogatory Responses

9	Shiquessta Brown Interrogatory Responses
10	Courtney Cherry Interrogatory Responses
11	Sharon Cherry Interrogatory Responses
12	Anthony Fuller Interrogatory Responses
13	Nahla Graham Interrogatory Responses
14	Alex Johnson Interrogatory Responses
15	Lakita Johnson Interrogatory Responses
16	Amanda Johnston Interrogatory Responses
17	Alexis Levette Interrogatory Responses
18	Brandon Mapp Interrogatory Responses
19	Jennifer Russell Interrogatory Responses
20	Arianna West Interrogatory Responses
21	Tika Arnold Deposition Transcript
22	Sharon Cherry Deposition Transcript
23	Anthony Fuller Deposition Transcript w/ attached Exhibit 1
24	Nahla Graham Deposition Transcript
25	Amanda Johnston Deposition Transcript

This the 16<sup>th</sup> day of February, 2023.

## GRAY NEWELL THOMAS, LLP.

BY: /s/ Angela Gray
Angela Newell Gray
7 Corporate Center Court, Suite B
Greensboro, NC 27408
Telephone: (336) 285-8151
Facsimile: (336) 458-9359

Email: angela@graynewell.com
Attorney for Defendants/Counterclaim Plaintiff
NC Bar # 21006

## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA GREENSBORO DIVISION CASE NUMBER: 1:21-cv-506

Fiffany Wade, individually, and on behalf of all others similarly situated,	)	
Plaintiff,	)	
	)	
VS.	)	<u>Certificate of Service</u>
	)	
	)	
MJ Enterprises, LLC and	)	
Traci Johnson Martin,	)	
Defendants.	)	

I, Angela Newell Gray, Attorney for the Defendants, do hereby certify that I filed the foregoing Defendants' Response in Opposition to Plaintiff's Rule 23 Motion with the Clerk of Court using the CM/ECF electronic filing service which will send electronic notification to the following CM/ECF participants: L. Michelle Gessner at michelle@mgessnerlaw.com.

This the 16<sup>th</sup> day of February, 2023.

GRAY NEWELL THOMAS, LLP.

BY: /s/ Angela Gray

Angela Newell Gray

7 Corporate Center Court, Suite B

Greensboro, NC 27408

Telephone: (336) 285-8151 Facsimile: (336) 458-9359

Email: angela@graynewell.com

Attorney for Defendants/Counterclaim Plaintiff

NC Bar # 21006